EXHIBIT A

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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

AARON C. BORING AND CHRISTINE BORING, husband and wife respectively,

Plaintiffs,

v.

GOOGLE, Inc., a California corporation,

Defendant.

CIVIL DIVISION
JURY TRIAL DEMANDED

CASE NO: GD 08-6615

COMPLAINT IN CIVIL ACTION

Filed on behalf of Plaintiffs: AARON C. BORING and CHRISTINE BORING, Plaintiffs.

Counsel of Record for this Party:

Dennis M. Moskal, Esq.
PA I.D. # 80106

Allegheny Building, 12th Floor
Pittsburgh, PA 15219-1616

412.765.0405

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NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) days after this complaint and notice are served, by entering a written appearance personally or by your attorney, and filing, in writing with the court, your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, OR YOU CANNOT AFFORD ONE, GO TO, OR TELEPHONE, THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

LAWYER REFERRAL SERVICE
Allegheny County Bar Association
Koppers Building, Suite 400
436 Seventh Avenue
Pittsburgh, PA 15219, USA
Telephone: 412-261-5555

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

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COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, Aaron C. Boring and Christine Boring, by and through their legal counsel, Dennis M. Moskal, Esq., and files the within Complaint in Civil Action against Google, Inc., and avers as follows:

THE PARTIES

1. Plaintiffs, Aaron C. Boring and Christine Boring, are adult individuals who reside at 1567 Oakridge Lane, Allegheny County, Pittsburgh, PA 15237, USA. They are husband and wife respectfully.

2. Defendant, Google, Inc., is a California corporation with principal place of business located at 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.

VENUE

3. Venue is proper in Allegheny County as the occurrences occurred in said County.

COUNT I: INVASION OF PRIVACY

4. Plaintiffs hereby incorporate by this reference paragraphs one (1) through three (3) of this pleading, inclusive, as fully set forth herein at length.

5. On or about October 10, 2006, Plaintiffs had purchased their home on Oakridge Lane for a considerable sum of money. A major component of their purchase decision was a desire for privacy. The property includes the residence, two garages and swimming pool. There is also a fifty foot right of way to their home.

6. At the beginning of Oakridge Lane, there is a clearly marked "Private Road" sign.

7. On or about May 2007, Google launched "Google Street View," a Maps-based project that offers 360-degree panoramic, navigable view of various streets and roads in major cities in the United States, including Pittsburgh, Pennsylvania.

8. In order to gather the pictures for Google Street View, Google mounts digital cameras on the roof of passenger cars and drives around the various cities filming the street footage.

9. Plaintiffs, who live on a private road in the Franklin Park/North Hills section of Pittsburgh, discovered that Google had taken pictures of their residence, including the swimming pool, from a vehicle

in their residence driveway without obtaining any privacy waiver or authorization.

10. As residents living on a private road, Plaintiffs had a reasonable expectation of privacy, as well as within their exclusive residence.

11. The acts of Defendant Google constitute an intentional and/or grossly reckless invasion on Plaintiffs' seclusion in that Oakridge Lane is clearly marked with a "Private Road" sign. To drive up Plaintiffs' driveway and stop in proximity to the residence, garage and swimming pool, Defendant significantly disregarded Plaintiffs' privacy interests.

12. The invasion on Plaintiffs' seclusion was substantial and highly offensive to a reasonable person.

13. This private information was made known to the public at large as part of Google Street View.

14. Revealing this information has caused Plaintiffs' mental suffering and diminished the value of their property.

15. Defendants reckless conduct has exposed Plaintiffs' private information to the public at large with the commensurate risks that this is entails. Punitive damages are warranted to deter Defendant from further invading on the privacy of Plaintiffs and others.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in its favor in excess of Twenty-Five Thousand Dollars for compensatory, incidental and consequential damages, punitive damages, costs, all allowable attorneys' fees, and all other damages deemed to be just.

COUNT II: TRESPASS

16. Plaintiffs hereby incorporate by this reference paragraphs 1 through 15 of this pleading, inclusive, as fully set forth herein at length.

17. The conduct of Defendants constitutes an intentional trespass.

18. Defendant has no legal justification for driving on Oakridge Lane, filming and/or videotaping Plaintiffs' residence.

19. Punitive damages are requested for Defendant's intentional and/or grossly reckless conduct.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in its favor in excess of Twenty-Five Thousand Dollars for compensatory, incidental and consequential damages, punitive damages, costs, all allowable attorneys' fees, and all other damages deemed to be just.

COUNT III - INJUNCTION

20. Plaintiffs hereby incorporate by this reference paragraphs 1 through 19 of this pleading, inclusive, as fully set forth herein at length.

21. Plaintiffs do not have an adequate remedy at law, and so, request equitable relief, whereby Defendant shall immediately remove any and all pictures of Plaintiffs' residence and/or Oakridge Lane from

Streets View and any other Internet presence, cease and desist from entering upon the street and/or taking any photographs of the street, and immediately revising and/or implementing adequate procedures to ensure the privacy of those living along private roads.

23. Plaintiffs' also request that Defendants destroy any and all films, videotapes, pictures, negatives, or other medium containing Plaintiffs' residence and/or Oakridge Lane.

WHEREFORE, Plaintiffs respectfully request that the Court grant a preliminary and permanent injunction whereby Defendant immediately remove any and all pictures of Plaintiffs' residence and/or Oakridge Lane from Streets View, cease and desist from entering upon the street and/or taking any photographs of the street, and immediately revising and/or implementing adequate procedures to ensure the privacy of those living along private roads.

COUNT IV - NEGLIGENCE

24. Plaintiffs hereby incorporate by this reference paragraphs 1 through 23 of this pleading, inclusive, as fully set forth herein at length.

25. Defendant had a duty of care, breached its duty, Plaintiffs have been injured, and such breach was the proximate cause of Plaintiffs' injury.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in its favor in excess of Twenty-Five Thousand

Dollars for compensatory, incidental and consequential damages, and all other damages deemed to be just.

COUNT V: CONVERSION

26. Plaintiffs hereby incorporate by this reference paragraphs 1 through 26 of this pleading, inclusive, as fully set forth herein at length.

27. The conduct of Defendant constitutes conversion of value in Plaintiffs' property from Plaintiffs to Defendant.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter judgment in its favor in excess of Twenty-Five Thousand Dollars for compensatory, incidental and consequential damages, punitive damages, costs, all allowable attorneys' fees, and all other damages deemed to be just.

April 2, 2008

Dennis M. Moskal, Esq.
Attorney for Plaintiffs

Allegheny Building, 12th Floor
Pittsburgh, PA 15219-1616

412.765.0405

VERIFICATION

I verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

Date: 4/1/2008

Aaron C Boring

AARON C. BORING

VERIFICATION

I verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

Date: 4/1/08

Christine Boring
CHRISTINE BORING

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Plaintiffs,

v.

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JURY TRIAL DEMANDED

CASE NO: GD 08-006615

ACCEPTANCE OF SERVICE

Filed on behalf of Plaintiffs: AARON C. BORING and CHRISTINE BORING, Plaintiffs.

Counsel of Record for this Party:

Dennis M. Moskal, Esq.
PA I.D. # 80106

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ALLEGHENY COUNTY

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ACCEPTANCE OF SERVICE

I accept service of the Complaint in Civil Action on behalf of Defendant, Google, Inc., and certify that I am authorized to do so.

Date: April 28, 2008

Tonia Ouellette Klausner, Esq.
Attorney for Defendant

Wilson Sodini Goodrich & Rosati, PC
1301 Avenue of the Americas
New York, NY 10019